

### REMARKS

Reconsideration and allowance are respectfully requested. Claims 1, 8, 9, and 16 have been amended. Claims 1-20 remain pending.

Claims 1-20 stand rejected under 35 U.S.C. 102(b) as being anticipated by Matsumoto. Claims 1, 8 and 16 have been amended to define the invention more clearly and thus obviate the rejection. In particular, the independent claims, as amended, recite that each arm defines a substantially cantilever beam structure. This feature is clearly supported at paragraph [0020] and FIG. 5 of the specification.

If the “arms” of Matsumoto are the portions between the holes 11 in the wheel 1, the “arms” do not define cantilever beam structures since both ends of each “arm” are supported (e.g., by the outer and inner periphery of the wheel 1).

With regard to claims 4, 12 and 20, the Examiner contends that in Matsumoto, the “portions (32) are generally triangular with rounded corners”. Applicant disagrees. The portions 31 and 32 of Matsumoto are of generally trapezoid shape having four sides with corners (vertices) that terminate in points. Based on geometric definitions, a generally trapezoid shape having four sides cannot be considered to be a generally triangular shape requiring only three sides. Furthermore, in no way are the vertices of Matsumoto’s portions 32 rounded as claimed. As noted in the specification at paragraph [0020], the rounded vertices enable a smooth interaction with the arms.

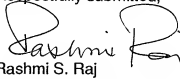
Claims 3, 11, and 19 recite that each arm includes a cored opening on a bottom side of the output gear (see items 26 of FIG. 2 of the specification) In Matsumoto, if the “arms” are considered to be the portions between the holes 11, there is no teaching in Matsumoto that each “arm” includes a cored opening in the bottom side of wheel 1. Therefore, the rejection is improper and should be withdrawn.

Hence, the rejection should be withdrawn because it fails to demonstrate that the applied reference discloses each and every element of the claims. See MPEP 2131. “The identical invention must be shown in as complete detail as is contained in the ... claim.” *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). “Anticipation cannot be predicated on teachings in the reference which are vague or based on conjecture.” *Studiengesellschaft Kohle mbH v. Dart*

*Industries, Inc.*, 549 F. Supp. 716, 216 USPQ 381 (D. Del. 1982), *aff'd.*, 726 F.2d 724, 220 USPQ 841 (Fed. Cir. 1984).

All objections and rejections having been addressed, it is respectfully submitted that this application is in condition for allowance and a notice to that effect is earnestly solicited.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Rashmi S. Raj". The signature is fluid and cursive, with the first name "Rashmi" being more prominent than the last name "Raj".

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